

ALC/LHE/SME F. #2016R00505

U.S. Department of Justice

United States Attorney Eastern District of New York

271 Cadman Plaza East Brooklyn, New York 11201

May 5, 2017

By ECF and Email

William A. Burck, Esq. Quinn Emanuel Urquhart & Sullivan, LLP 777 6th Street NW, 11th Floor Washington, D.C. 20001

Gregory J. O'Connell, Esq. De Feis O'Connell & Rose, P.C. 500 Fifth Avenue, Suite 2630 New York, New York 10110

Jonathan S. Sack, Esq. Morvillo, Abramowitz, Grand, Iason & Silberberg P.C. 565 Fifth Avenue New York, New York 10017

Michael D. Mann, Esq. Sidley Austin LLP 787 Seventh Avenue New York, New York 10019 Michael S. Sommer, Esq. Wilson Sonsini Goodrich & Rosati P.C. 1301 Avenue of the Americas, 40th Floor New York, New York 10019

Kevin J. O'Brien, Esq. Ford O'Brien LLP 85 Broad Street, 28th floor New York, New York 10004

Seth L. Levine, Esq. Levine Lee LLP 650 Fifth Avenue, 13th Floor New York, New York 10019

Re: United States v. Mark Nordlicht, <u>et al.</u> Criminal Docket No. 16-640 (DLI)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017, April 12, 2017 and April 26, 2017. The government again requests reciprocal discovery from the defendants.

The government has made available at First Choice Copy ("First Choice"), for reproduction to the defendants, electronic copies of hard copy materials that were recovered

Defense Counsel May 5, 2017 Page 2

cc:

through the search executed at the offices of Platinum Partners on June 22, 2016, and were seized from the locations described below:

- A desk and cabinet associated with Gilad Kalter and Bernard Fuchs: EDNY-PP-HC-000000001 EDNY-PP-HC-000009441;
- The office of Andrew Kaplan: EDNY-PP-HC-000009442 EDNY-PP-HC-000011177; and
- A filing cabinet across a hallway from the office of the defendant Joseph SanFilippo: EDNY-PP-HC-000011178 EDNY-PP-HC-000011725.

You may obtain copies of the materials listed above by contacting Joseph Meisner at First Choice at 718-381-1480, extension 212, and referencing the print order number provided by email. First Choice is located at 52-08 Grand Avenue, Maspeth, New York 11378.

Very truly yours,

BRIDGET M. ROHDE
Acting United States Attorney
Eastern District of New York

By: /s/
Alicyn L. Cooley
Lauren H. Elbert
Sarah M. Evans
Assistant U.S. Attorneys
(718) 254-6389 (Cooley)

Clerk of the Court (DLI) (by ECF) (w/o enclosures)